

KANSAS CITY SOUTHERN

MAILING ADDRESS: P.O. BOX 219335 • KANSAS CITY, MO 64121-9335



FOUNDED 1887

OFFICE AND EXPRESS DELIVERY ADDRESS:
427 WEST 12TH STREET
KANSAS CITY, MO 64105

DAVID C. REEVES
ASSOCIATE GENERAL COUNSEL
(816) 983-1387
FAX (816) 983-1227
E-MAIL: DREEVES@kcsouthern.com

July 11, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Reply Comments - WT Docket No. 11-79
Spectrum for Positive Train Control

Dear Ms. Dortch:

The Kansas City Southern Railway Company (KCSR) is one of America's Class I railroads. KCSR provides service in ten states in the south-central United States, and connects to many other railroads, including all of the other Class I U.S. railroads and, at the U.S.-Mexico border, with a major Mexican railroad.

In order to meet its obligations under the Rail Safety Improvement Act of 2008 for the implementation of positive train control (PTC), KCSR is working to secure access to spectrum that will be compatible with the technology noted in the comments of PTC-220, LLC. Like others who have commented in response to the Commission's request, KCSR also notes that there are significant challenges in obtaining sufficient spectrum, particularly in congested urban and other areas where multiple railroads operate.

The Commission has wisely sought input from those faced with the responsibility for implementing PTC. In addressing spectrum support for PTC, the Commission should move promptly to inventory compatible spectrum in the 216.5 – 222 MHz region and explore the ways in which portions of this spectrum may be made available in support of PTC. In order to meet the deployment deadline of December 31, 2015, spectrum availability issues will need to be resolved not later than the first half of 2012, as much of the implementation of PTC involves the development and testing of new, customized communications and control systems and the coordinated implementation of these systems among numerous railroads.

Respectfully,

David C. Reeves
Associate General Counsel
The Kansas City Southern Railway Company